

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

APR 15 2019

Alexandria Division

U.S. DISTRICT COURT
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA)	
)	<u>UNDER SEAL</u>
v.)	
)	No. 1:18-cr-111
JULIAN PAUL ASSANGE,)	
)	
Defendant.)	

MOTION TO UNSEAL CRIMINAL COMPLAINT AND SUPPORTING AFFIDAVIT

The United States, through undersigned counsel, hereby moves to unseal the criminal complaint and supporting affidavit filed on December 21, 2017, in this case. In support thereof, the government states as follows:

1. On December 21, 2017, the Court issued a criminal complaint, based on a supporting affidavit, charging the defendant with conspiracy to commit computer intrusion, in violation of Title 18, United States Code, Sections 371, 1030(a)(1), 1030(a)(2), and 1030(c)(2)(B)(ii). On the government's motion, the Court issued an order sealing the criminal complaint and supporting affidavit "until the defendant is arrested and extradited."

2. On March 6, 2018, a grand jury returned an indictment charging the defendant with one count of conspiracy to commit computer intrusion, in violation of Title 18, United States Code, Sections 371, 1030(a)(1), 1030(a)(2), and 1030(c)(2)(B)(ii). On the government's motion, the Court issued an order sealing the indictment and arrest warrant until "the time of the arrest of the defendant."

3. On April 11, 2019, the defendant was arrested in the United Kingdom in connection with the above-described indictment. As a result, the indictment is now unsealed. Because the

charge against the defendant is now a matter of public record, the criminal complaint and supporting affidavit should be unsealed as well.

4. For the foregoing reasons, the government requests that the Court unseal the criminal complaint and supporting affidavit.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

By:

A handwritten signature in black ink, appearing to read 'T. Traxler', is written over a horizontal line.

Thomas W. Traxler
Assistant United States Attorney